

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**X CORP.,**

Plaintiff,

vs.

Case No. 4:23-cv-01175-O

**MEDIA MATTERS FOR AMERICA, et  
al.**

Defendants.

**JOINT STIPULATION REGARDING DISCOVERY LIMITS**

Pursuant to Federal Rule of Civil Procedure 29, Plaintiff X Corp. and Defendants Media Matters for America, Eric Hananoki, and Angelo Carusone, by and through their respective counsel, hereby stipulate and agree to the following deposition limits:

1. Each side is allowed ten (10) fact depositions of party witnesses. The parties agree that a properly noticed Federal Rule of Civil Procedure 30(b)(6) deposition of an opposing party will count as one of each side's 10 party depositions regardless of the number of deponents designated.
2. Each side will be allowed 50 deposition hours on the record of subpoenaed third parties. Subpoenaed third parties include former employees of a party.
3. Each party has the right to depose before trial any witnesses the opposing party identifies as trial witnesses who have not already been deposed, even if doing so would result in that party deposing more than 10 total party witnesses.

Unless modified by agreement of the Parties or by the Court, the seven (7) hour time limit per deposition as provided by Federal Rule of Civil Procedure 30(d)(2) will apply. No single deponent can be deposed for more than seven hours as a fact witness, except by subsequent agreement or by leave of Court. If either party designates someone who was deposed as a fact witness as a 30(b)(6) corporate representative, that person may be deposed for more than 7 hours over the two separate depositions.

Nothing in this Stipulation should be construed as preventing either party from making a future petition to the Court for further deposition time, for either individuals or in general, or for other modifications to these limits. Likewise, nothing herein should be construed as preventing either party from moving to quash the deposition of any specific individual or entity, from moving to compel the deposition of a specific individual or entity, or from otherwise seeking appropriate protection or relief from the Court.

Dated: July 7, 2025

Respectfully submitted.

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/s/ Chris Hilton

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 7, 2025, a copy of this document was served on all counsel of record through the Court's CM/ECF system in accordance with the Federal Rules of Civil Procedure.

/s/ Justin Nelson  
Justin Nelson